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5 Attorney for Defendant  
6 ISHU LAKRA

7 THE UNITED STATES DISTRICT COURT  
8  
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 vs.  
14 NAVIN KHANNA, aka Lovin Khanna, TINU  
15 KHANNA, aka Gagan Khanna, DANIEL  
16 DOLAN, CHI MO, aka David Mo, WRIGHT  
17 LOUIS MOSLEY, ISHU LAKRA, TOU SUE  
18 VANG, ANDREW VANG, and MONICA  
19 MOUA,  
20 Defendants.

Case No.: 2:22-CR-0213 KJM

UNOPPOSED MOTION AND ORDER TO  
MODIFY CONDITIONS OF RELEASE TO  
ALLOW FOR TRAVEL

Judge: Hon. Kimberly J. Mueller

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Defendant has been released on his own recognizance with the only travel  
restrictions being that he shall notify counsel of any travel outside the Eastern District of  
California or the Eastern District of North Carolina and to surrender his passport to  
United States District Court (Special Condition number five). Defendant respectfully  
requests permission to travel outside the United States sometime between March 15,  
2024, and April 15, 2024, to New Delhi, India, to visit his elderly parents. The defendant  
further requests permission to possess his passport for up to one week before and after  
the trip as necessary to facilitate this travel.

On October 20, 2022, Ishu Lakra was indicted on one count of conspiracy to  
transport property interstate in violation of 18 U.S.C. § 371. He made arrangements to

1 travel from New Jersey and appear in court voluntarily for his initial appearance on  
2 December 19, 2022, and he was released on his own recognizance.

3 Mr. Lakra requests that his conditions of release be modified to state: "Your  
4 passport shall be released from the U.S. Clerk's office to defense counsel on March 8,  
5 2024. You may travel to India any time between March 15, 2024, and remain there until  
6 any time up to April 15, 2024. You shall return to the United States (residence in North  
7 Carolina) no later than April 15, 2024. You are authorized to possess your U.S. Passport  
8 between March 8, 2024, and April 22, 2024. You shall return your passport to your  
9 attorney by April 22, 2024."

10 The United States has indicated that it does not oppose this request.

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12 DATED: February 8, 2024

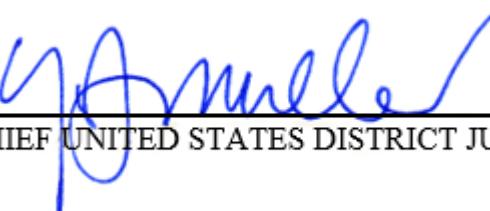
Respectfully submitted,

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15 /S/ Tamara Solomon \_\_\_\_\_  
16 TAMARA SOLOMAN  
17 Attorney for Defendant  
18 ISHU LAKRA

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20 **ORDER**

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22 IT IS SO ORDERED.

23 DATED: February 12, 2024.

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CHIEF UNITED STATES DISTRICT JUDGE